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May 7, 2024

By ECF and Email

Honorable Analisa Torres, U.S.D.J.
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
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Re: Doe v. Portnow, et al.; Civil Action No. 1:24-cv-00345 (AT)

Dear Judge Torres:

We represent Defendant National Academy of Recording Arts & Sciences, Inc. (the "Recording Academy") in the above-referenced matter and write in light of yesterday's filing of Plaintiff's Request for Voluntary Dismissal Without Prejudice (Dkt. 37). We are considering all relief and options potentially available to the Recording Academy and respectfully ask this Court to allow us time to further review Plaintiff's submission and the Recording Academy's response to her request. We respectfully request that the Court allow us until Tuesday, May 14, 2024 to provide the Recording Academy's position with respect to Plaintiff's request and that the Court take no action prior thereto.

Additionally, we respectfully request that this Court stay the pending deadlines in the interim, specifically, the May 13, 2024 deadline to file a joint letter, proposed case management plan, and whether the parties consent to proceed before a magistrate judge.

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

cc: All Counsel of Record (by ECF)